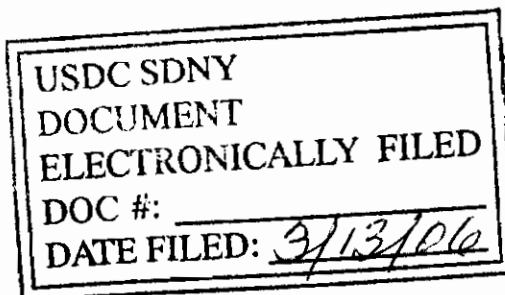


SULLIVAN &  
WORCESTER

Sullivan & Worcester LLP  
1290 Avenue of the Americas  
New York, NY 10104

T 212 660 3000  
F 212 660 3001  
www.sandw.com

Direct line: 212 660 3042  
mstein@sandw.com



**MEMO ENDORSED**

March 13, 2006

**BY FAX**

Honorable James C. Francis, IV  
United States Magistrate Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street, Room 1960  
New York, New York 10007-1312

Re: American Steamship Owners Mutual Protection and Indemnity Association, Inc. v. Alcoa Steamship Co., Inc., et al., No. 04 Civ. 04309 (LAK) (JCF)

Dear Magistrate Judge Francis:

We, along with Nourse & Bowles, LLP, are counsel for plaintiff in the above-referenced action. We write as a follow-up to our letter dated March 9 regarding *Daubert* motions. Moving papers on the *Daubert* motions are currently due March 17, 2006, answering papers are due April 19, 2006, and reply papers are due on April 27, 2006.

We write respectfully to request an adjournment of the deadline for filing moving papers for the *Daubert* motions until Wednesday, March 22, 2006, pending a ruling on the parties' joint request that Judge Kaplan hear the *Daubert* motions on a schedule set by him. We have conferred with Mr. Schafler, counsel for the Keystone defendants, who indicated that defendants agree to the proposed adjournment. Thank you. //

Respectfully submitted,

Mitchell C. Stein

cc: All Counsel (by e-mail)

~~3/13/06~~ 3/13/06  
Application granted.  
SO ORDERED.  
James C. Francis IV  
USMJ